

File
Vulcan
materials
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State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Barbara J. Sabol, Secretary

Forbes Field
Topeka, Kansas 66620-0110
913-862-9360

March 6, 1986

Harold P. Owens
Chief, Groundwater Section
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr. Owens:

Thank you for your agency's additional comments regarding the Vulcan Chemicals revised draft UIC permits. The following is in response to the letter dated February 7, 1986 from Morris Kay to Barbara Sabol. My responses will be in the same order as the comments were presented.

1. The revised draft permits have been further revised to specifically reference the abandonment and plugging procedures as described in their December 19, 1984 application.
2. No response necessary.
3. The revised draft permits have been further revised to outline exact mechanical integrity test procedures. Part of the test is to include setting a retrievable bridge plug or packer and pressure testing the casing at 200 psi for a period of one hour. The test, as outlined in the revised draft permits, is to be conducted once every two years. This more stringent mechanical integrity test in combination with the daily monitoring of the annulus pressure would seem to provide the necessary assurance of the integrity of each well.
4. The revised draft permits have been further revised to outline the specific procedures to be employed when a loss in annulus pressure of 25% or more occurs.
5. On Page 2 of the draft permits, the injection limitations for pH is specified "no limit." This was done primarily because on occasion the pH of Vulcan's wastewater is less than 2.0 or is greater than 12.5. The more stringent mechanical integrity test will provide assurance that excessive deterioration of the casing has not occurred.

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Should you have any questions, please feel free to let me know.
If and when the permits are reissued, I will send copies of the final permits.

Sincerely,

OFFICE OF ENVIRONMENTAL GEOLOGY

E. Jean Underwood

E. Jean Underwood
Environmental Geologist
Bureau of Oil Field and
Environmental Geology

EJU:sc

cc: Secretary Sabol
Sharad Bhatia
Bill Bryson
Larry Knoche
Ron Hammerschmidt
John Mitchell